



Law Offices of **JEREMY L. KAY, P.C.**

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September 9, 2009

VIA FIRST CLASS MAIL AND E-MAIL

Honorable Robert B. Collings
U.S. District Court for the District of Massachusetts
John Joseph Moakley U.S. Court House
1 Courthouse Way, Suite 2003
Boston, MA 02210
noreen_russo@mad.uscourts.gov

Re: Timothy Hills v. Town of Stoughton, et al., C.A. No. 1:05-cv-10488-RBC

Dear Magistrate Collins:

I would like to bring to your attention a Preliminary Injunction which has been issued in favor of my client, Peter Marinelli, by the Norfolk County Superior Court. Mr. Marinelli is a judgment creditor of Timothy Hills, the Plaintiff in the above-referenced case.

The Preliminary Injunction (which is annexed hereto) precludes the Defendants in the above-referenced case from making any monetary payment to or on behalf of Mr. Hills prior to placing \$45,000.00 in escrow with this office.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'J L Kay'.

Jeremy L. Kay

NORFOLK, ss.

SUPERIOR COURT
CIVIL ACTION

Peter T. Marinelli d/b/a
Target Consulting Group Plaintiff(s)
NO. 09-1506

Timothy Alan Hills a/k/a Timothy A. Hills a/k/a
Timothy Hills Defendant(s)

Town of Stoughton, David M. Cohen and Manuel Cachopa
INTERLOCUTORY ORDER ON Reach and Apply Defendants,
PRELIMINARY INJUNCTION

This action came on to be further heard at this sitting upon the return of an order of notice to show cause why the application for a preliminary injunction should not be granted, and was argued by counsel; and thereupon, upon consideration thereof, it is ORDERED and ADJUDGED that upon payment to the clerk of the sum of \$6.00 the application under the Plaintiff(s) Motion for Reach and Apply Injunction presents of the Complaint hereby is granted, and the Defendants, Reach and Apply Defendants, Town of Stoughton, Manuel Cachopa and David Cohen and each of their agents, employees, officers, attorneys, insurers, Subsidiaries, divisions, affiliates, representatives, successors and assigns are enjoined and restrained from transferring, paying, distributing or otherwise providing any amounts to or on behalf of Timothy Hills until such time as he/it/they have placed the sum of Forty-five thousand dollars (\$45,000.00) in escrow with Plaintiff's legal counsel or the Judgment has been satisfied in the Stoughton District Court Civil Action Docket No. 0255CV340, Peter T. Marinelli, d/b/a v. Timothy Alan Hills a/k/a.

until further order of Court.

By the Court (

Sander,

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Entered Sept 1, 2009 10

Attest: *John P. Hulsey*
John P. Hulsey
Assistant Clerk

Attest:

A TRUE COPY
John P. Hulsey
John P. Hulsey
Assistant Clerk